



John Troy <johntroy@troypllc.com>

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**Re: Wang et al. v. Chapei LLC et al. 15-cv-2950 - Discovery Requests**

1 message

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**Troy Law** <troylaw@troypllc.com>

Fri, Jun 10, 2016 at 11:16 AM

To: Heng Wang <heng.wang@wanggaolaw.com>, Troy Law <troylaw@troypllc.com>

Mr. Wang,

Discovery was sent to you on April 26 via mail and email. The scanned copies of the original mailed documents are even in my system. Do you not think that 6 weeks later is a little late to notice that you "cannot find" these documents--especially since the original due date for responses was on June 1?

I have instructed someone on my staff to send you fixed notices of depositions, and the scanned copies of the original first requests for interrogatories and requests for document production that I have in my system via certified mail so that there is no question as to whether or not you received them.

-John Troy  
/ic

**TROY LAW**

***Attorneys & Counselors at Law***

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蔡鴻章律師事務所

*Our firm does not accept paper or fax correspondence, including service and production of documents, which must be sent by e-mail*

On Thu, Jun 9, 2016 at 6:24 PM, Heng Wang <heng.wang@wanggaolaw.com> wrote:

Mr. Troy, I don't have your discovery requests purportedly mailed to me.

--

Heng Wang, Esq.

Wang, Gao & Associates, P.C.

36 Bridge Street  
Metuchen, NJ 08840  
Tel: (732) 767-3020  
Fax: (732) 343-6880

305 Broadway, Suite 1000  
New York, NY 10007

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**From:** Troy Law [mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)]

**Sent:** Wednesday, June 08, 2016 9:42 AM

**To:** Heng Wang

**Cc:** John Troy; Lina Franco

**Subject:** Re: Wang et al. v. Chapei LLC et al. 15-cv-2950 - Discovery Requests

Dear Mr. Wang:

We have mailed the discovery request on the date we have emailed you.

Please check the file again.

Thank you.

John Troy

/gb

**TROY LAW**

***Attorneys & Counselors at Law***

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production of documents, which must be sent by e-mail*

On Tue, Jun 7, 2016 at 5:37 PM, Heng Wang <[heng.wang@wanggaolaw.com](mailto:heng.wang@wanggaolaw.com)> wrote:

Mr. Troy,

I search the case file again and confirmed that we have never received your discovery demands served in accordance with the rules. We have never consented to service by email, and in fact, I previously objected to your informal service.

--

Heng Wang, Esq.

Wang, Gao & Associates, P.C.

36 Bridge Street  
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**From:** Troy Law [mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)]  
**Sent:** Tuesday, April 26, 2016 2:31 PM  
**To:** Wang Gao Law  
**Cc:** John Troy  
**Subject:** Re: Wang et al. v. Chapei LLC et al. 15-cv-2950 - Discovery Requests

Dear Mr. Wang:

Please find attached the following : (1) Plaintiffs' First Request for the Production of Documents; (2) Plaintiffs' First Request for Interrogatories for the above referenced case.

Pursuant to Rule 33 and 34 of the Federal Rules of Civil Procedure, Defendants' responses are due on or before May 26, 2016.

Best regards,

John Troy

/gb

**TROY LAW**

***Attorneys & Counselors at Law***

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